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Attorneys for The Roman Catholic Archbishop of
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,
Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**SUPPLEMENTAL DECLARATION OF
PAUL J. PASCUZZI IN SUPPORT OF
FIRST INTERIM APPLICATION OF
FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP
FOR ALLOWANCE OF FEES AND
REIMBURSEMENT OF EXPENSES AS
BANKRUPTCY COUNSEL FOR THE
DEBTOR IN POSSESSION**

Date: April 18, 2024
Time: 1:30 p.m.
Location: Via ZoomGov
Judge: Hon. Dennis Montali

Case No. 23-30564

SUPP DECLARATION IN SUPPORT OF FFWR FIRST
INTERIM APPLICATION FOR ALLOWANCE OF FEES

1 I, Paul J. Pascuzzi, declare:

2 1. I am an attorney duly licensed to practice law in the State of California and a partner
3 with Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP ("FFWPR"), the attorneys for The
4 Roman Catholic Archbishop of San Francisco, a California corporation sole, the debtor and debtor
5 in possession herein (the "Debtor"). If called as a witness, I would and could testify competently
6 to the matters stated herein.

7 2. I have been a partner of FFWPR since January 1, 1999. As such, I have personal
8 knowledge of my firm's billing policies and practices. I have read the accompanying Application
9 of Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP for first allowance of attorneys' fees
10 and reimbursement of expenses and to the best of my knowledge, all statements are true and correct.

11 3. This supplemental declaration is made in support of the *First Interim Fee*
12 *Application of Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP for Allowance of Fees and*
13 *Reimburse Expenses* (the "Application") for the approximately five-and-a-half-month period of
14 August 21, 2023, through and including January 31, 2024, (the "Application Period").

15 4. The United States Trustee's Office has noted that the Application did not include
16 the following information in compliance with the UST Guidelines: (a) information to be provided
17 about customary and comparable compensation; and (b) information about budget and staffing
18 plans. This supplemental declaration is provided to address those comments from the U.S. Trustee.

19 5. Attached to this declaration as ***Exhibit 1*** is a summary of customary and comparable
20 compensation prepared by FFWPR describing the blended hourly rates of the various categories of
21 timekeepers that provided services to the Debtor during the Application Period. I give defined
22 terms used in this exhibit the same meanings ascribed to them in ¶ C.3 of the UST Guidelines.

23 6. Attached to this declaration as ***Exhibit 2*** is a copy of the "Attorney Fee Budget"
24 agreed upon by and between the Debtor and FFWPR. This exhibit also includes a comparison of
25 budgeted to actual fees sought during the Application Period. FFWPR is not submitting a detailed

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1 staffing plan or summary of fees and hours budgeted compared to fees and hours billed for each
2 project category as this information is privileged and confidential.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on April
4 11, 2024, at Sacramento, California.

5 /s/ Paul J. Pascuzzi
6 PAUL J. PASCUZZI
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EXHIBIT 1

CUSTOMARY AND COMPARABLE COMENSATION DISCLOSURES

(See Guidlines C.3. for definitions of terms used in this Exhibit)

CATEGORY OF TIMEKEEPER (using categories already maintained by the firm)	BLENDED HOURLY RATE	
	BILLED OR COLLECTED Firm or offices for preceding year, excluding bankruptcy*	BILLED In this fee application
Sr./Equity Partner	\$ 491.37	\$ 498.71
Of Counsel	\$ 424.34	\$ 392.52
Paralegal/Legal Assistants	\$ 100.42	\$ 86.13
All timekeepers aggregated	\$ 338.71	\$ 325.79

* Non-estate work does not include fees and corresponding hours reduced by FFWPR for administrative tasks/service provided.

EXHIBIT 2

FELDERSTEIN FITZGERALD WILLOUGHBY PASCUZZI & RIOS FEE BUDGET

MONTH	FEES AND EXPENSES		
	BUDGET	SOUGHT	VARIANCE over/(under)
AUGUST 2023	\$ 45,000.00	\$ 33,098.89	\$ (11,901.11)
SEPTEMBER 2023	\$ 100,000.00	\$ 65,396.00	\$ (34,604.00)
OCTOBER 2023	\$ 100,000.00	\$ 66,966.30	\$ (33,033.70)
NOVEMBER 2023	\$ 75,000.00	\$ 69,711.79	\$ (5,288.21)
DECEMBER 2023	\$ 75,000.00	\$ 36,782.50	\$ (38,217.50)
JANUARY 2024	\$ 85,000.00	\$ 42,804.91	\$ (42,195.09)
Total for the Period August 21, 2023 - January 31, 2024	\$ 480,000.00	\$ 314,760.39	\$ (165,239.61)